

IN THE DISTRICT COURT OF THE UNITED STATES FOR THE
MIDDLE DISTRICT OF ALABAMA, NORTHERN DIVISION

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RICHARD WAYNE WRIGHT, SR.,
Plaintiff,

-VS-

SYLVESTER NETTLES, et. al.,
Defendant.

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CIVIL CASE NO. 2:05-CV-439-A-WO

MOTION FOR RECONSIDERATION FOR APPOINTMENT OF COUNSEL

COMES NOW, RICHARD WAYNE WRIGHT, SR., Plaintiff, Pro-Se., in the above style cause and Respectfully Moves the Honorable Court to reconsider plaintiff request for an appointment of counsel.

Plaintiff would state the following in support of said motion:

1). Plaintiff has a very limited amount of knowledge in the ways of the legal system.

2). The plaintiff has a very limited access to legal material, as well as limited time in the law library at Ventress Correctional Facility (V.C.F.), nor is there a copy machine available to inmates who are indigent as myself, which are not able to pay the fifty (.50¢) cents (copy fee's) per page for any and all exhibits.

3). Plaintiff cannot possibly match the experience or the knowledge of the defendant's attorney's in the cause.

4). The plaintiff must rely on the assistance from law clerks/inmate who are not trained as para-legals and just have the least basic knowledge of the law, and it would be a disadvantage for plaintiff to have to try and match the expertise of the defendant's Counsel as such.

5). The issues in this cause involves Plaintiff attempts to file criminal

charges against said individuals, will also allow "some" consideration to develop in defendant's mind to control their action because plaintiff has (if granted) an attorney which has legal knowledge concerning the law and can obtain permission from legal authorities to come into this prison and investigate any and all further attacks they may implement upon plaintiff.

6). By the time this case gets in full course these issues will be extremely complex and thus confusing to the plaintiff. All ready plaintiff is having difficulty retrieving address of past defendants and documents/ exhibits he has sent to the United States district Court which are very essential to this case.

7). Plaintiff testimony will be in sharp conflict. Since plaintiff has declared the defendant's force psychotropic drugs into his body through intimidation and threats and have willingly neglected providing (him) medical care by affording him the bare minimum treatment and at times paying no attention to his medical needs.

8). This case contains several different legal claims, with each claim involving a different set of defendant(s).


9). This case involves and will require discovery and documents and depositions of a number of witnesses and medical issues that may require expert testimony and physical examination.

WHEREFORE, premises considered, plaintiff respectfully prays that this Honorable Court to represent him in this matter.

The Ends of Justice would best be met, if this Motion is Granted.

DONE THIS THE 22nd DAY OF October, 2005.

RESPECTFULLY SUBMITTED,


RICHARD WAYNE WRIGHT SR.#187140
VENTRESS CORRECTIONAL FACILITY
DORM 10/B BED 55/B
POST OFFICE BOX 767
CLAYTON, ALABAMA 36016

CERTIFICATE OF SERVICE

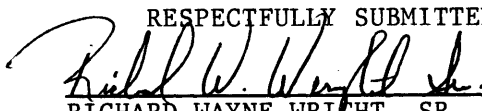
This is to certify that I Richard Wayne Wright, Sr., am the plaintiff in the above encaptioned motion and I have sent this motion to the clerk of this Court and the following defendant's:

DAVID B. BLOCK
WILLIAM R. LUNSFORD
BALCH & BINGHAMLLP
POST OFFICE BOX 18668
HUNTSVILLE, ALABAMA 35804- 8668

KIM T. THOMAS
GREGG M. BIGGS
ALABAMA DEPARTMENT OF
CORRECTION LEGAL DIVISION
301 RIPLEY STREET
MONTGOMERY, ALABAMA 36130

STEVEN M. SIRMON
HUGH DAVIS
ALABAMA BOARD PARDONS AND
PAROLES
301 SOUTH PIPELEY STREET
POST BOX OFFICE 302405
MONTGOMERY, ALABAMA 36130

by placing same in the legal mail box located in the kitchen at Ventress Correctional facility, for first class postage to be prepaid by (A.D.O.C.) officials at (V.C.F.) and properly address this on the 22nd day of October, 2005.

RESPECTFULLY SUBMITTED,

RICHARD WAYNE WRIGHT, SR.,#187140
PETITIONER Pro-Se

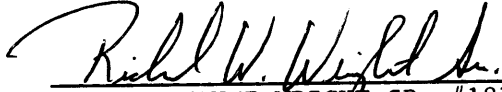
NOTARY STATEMENT

STATE OF ALABAMA)
COUNTY OF BARBOUR)

BEFORE ME, A Notary Public in and for said County, in said State, personally appeared Richard Wayne Wright, Sr.m whose name is signed to the

foregoing motion. Who being first duly affirmed, desposes an oath and says:

" That the information set fourth in the foregoing motion
is true and correct to the best of his knowledge and belief".


RICHARD WAYNE WRIGHT, SR., #187140
Signature of Affiant

AFFIRMED TO AND SUBSCRIBED BEFORE ME ON THIS THE 22nd DAY OF
October, 2005.


NOTARY PUBLIC

My Commission Expires August 18, 2007

MY COMMISSION EXPIRES